

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

**In re:** Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Douglas Stephen Taylor

**Debtor 1**

Noelle Denise Taylor

**Debtor 2**

Citadel Federal Credit Union

**Movant(s)**

v.

Douglas Stephen Taylor

Noelle Denise Taylor

**Respondent(s)**

Jack N. Zaharopoulos, Esquire

Standing Chapter 13 Trustee

**Additional Respondent**

**Chapter 13**

**Case No.** 1:22-BK-00900-HWV

**Matter:** Motion for Relief from the Automatic Stay

**Document No.** 42

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Douglas Stephen Taylor and Noelle Denise Taylor, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.

2. Admitted.

3. Paragraph 3 contains a conclusion of law to which no response is required.

4. Admitted.

5. Admitted in part, denied in part. It is admitted that Debtor(s) have defaulted on payments due under the Retail Installment Contract, and wish to bring their account current per stipulations agreeable to the parties. Debtor(s) are without specific knowledge as to the amount owed of such defaults; therefore, it is denied. Strict proof is demanded.

6. Denied. Debtor(s) are without specific knowledge as to the payoff balance; therefore, it is denied. Strict proof is demanded.

7. Admitted.

8. Paragraph 8 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,  
**DETHLEFS PYKOSH & MURPHY**

Date: September 26, 2016

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
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*Attorney for Debtor(s)*

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**CERTIFICATE OF SERVICE**

I hereby certify that on Monday, September 26, 2022, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

James Valecko, Esquire  
Weltman, Weinberg & Reis Co., LPA  
436 Seventh Avenue, Suite 2500  
Pittsburgh, PA 15219  
*Counsel for Movant(s)*

Jack H. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Office of the United States Trustee  
Ronald Reagan Federal Building  
228 Walnut Street, Room 1190  
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire